

1 CATHERINE D. KEVANE (CSB No. 215501)
2 ckevane@fenwick.com
3 MARIE C. BAFUS (CSB No. 258417)
4 mbalus@fenwick.com
5 FENWICK & WEST LLP
555 California Street, 12th Floor
San Francisco, CA 94104
Telephone: 415.875.2300
Facsimile: 415.281.1350

6 Counsel for Defendant ANDREW R. ALLEN

7 [Additional Counsel on Signature Page]

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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13
14 IN RE GRITSTONE BIO, INC. SECURITIES
15 LITIGATION

16 THIS DOCUMENT RELATES TO: ALL
17 ACTIONS

Case No.: 3:24-cv-03640-CRB

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER AMENDING BRIEFING
SCHEDULE FOR MOTION TO DISMISS
THE SECOND AMENDED
COMPLAINT AND CONTINUING
MOTION HEARING**

18
19 Hon. Charles R. Breyer

1 Pursuant to Civil Local Rules 6-2, Lead Plaintiff Richard Rodriguez and Additional
2 Plaintiff Tammy Beal (“Plaintiffs”) and Defendant Andrew R. Allen (“Defendant”) respectfully
3 request that the Court enter the parties’ stipulation below to amend the briefing schedule for
4 Defendant’s motion to dismiss the Second Amended Complaint (Dkt. 70, “SAC”).

5 WHEREAS, On July 24, 2025, the Court granted Defendant’s motion to dismiss the First
6 Amended Complaint (“FAC”) (“Order”), dismissing without prejudice the claims against
7 Defendant and directing Plaintiffs to file any amended complaint no later than 28 days from the
8 issuance of the Order;

9 WHEREAS, on August 21, 2025, Plaintiffs filed the SAC against Defendant;

10 WHEREAS, Defendant’s counsel informed Plaintiffs’ counsel that Defendant intends to
11 move to dismiss the SAC;

12 WHEREAS, on August 26, 2025, the Court granted the parties’ Stipulation and [Proposed]
13 Order Regarding Briefing Schedule and Page Limits for Motion to Dismiss the SAC (Dkt. 72,
14 “First Stipulation and Order”), entering the following briefing schedule and page limits:

- 15 • **Defendant’s motion to dismiss the SAC:** October 10, 2025, no more than 25
16 pages
- 17 • **Plaintiffs’ opposition to Defendant’s motion to dismiss:** November 24,
18 2025, no more than 25 pages
- 19 • **Defendant’s reply in support of the motion to dismiss:** December 19, 2025,
20 no more than 15 pages
- 21 • **Motion hearing:** January 16, 2026 at 10:00 a.m. by videoconference;

22 WHEREAS, on October 6, 2025, Defendant’s counsel conferred with Plaintiffs’ counsel
23 to request amending the briefing schedule and continuing the January 16, 2026 motion hearing in
24 order to accommodate the unforeseen travel and scheduling conflicts of Defendant’s counsel, and
25 Plaintiffs’ counsel agreed;

26 WHEREAS, the parties agree that the page limits set forth in the First Stipulation and
27 Order should continue to apply to any motion to dismiss the SAC and the associated response and
28 reply thereto; and

1 WHEREAS, the parties previously stipulated to extend the deadline for Defendant to
 2 respond to the FAC and the SAC, and the parties' requested time modification below will not
 3 otherwise affect the schedule for the case.

4 IT IS HEREBY STIPULATED AND AGREED THAT, subject to the Court's approval,
 5 as follows:

- 6 1. On or before October 17, 2025, Defendant shall file his motion to dismiss the SAC.
- 7 2. On or before December 8, 2025, Plaintiffs shall file their brief in opposition to the
 motion to dismiss the SAC.
- 9 3. On or before January 2, 2026, Defendant shall file his reply brief in support of the
 motion to dismiss the SAC.

11 4. The parties respectfully request that the motion hearing, currently scheduled for
 12 January 16, 2026 at 10:00 a.m. by videoconference, be continued to a later date as the Court
 13 determines to be appropriate.

14 Dated: October 6, 2025

POMERANTZ LLP

16 By: /s/ Jennifer Pafiti

17 Jennifer Pafiti (SBN 282790)
 1100 Glendon Avenue, 15th Floor
 18 Los Angeles, California 90024
 Telephone: (310) 405-7190
 19 jpfafiti@pomlaw.com

20 POMERANTZ LLP
 21 J. Alexander Hood II (*pro hac vice*)
 Samantha Daniels (*pro hac vice*)
 600 Third Avenue, 20th Floor
 22 New York, New York 10016
 Telephone: (212) 661-1100
 Facsimile: (917) 463-1044
 23 jalieberman@pomlaw.com
 ahood@pomlaw.com
 24 sdaniels@pomlaw.com

25 *Counsel for Lead Plaintiff Richard Rodriguez
 26 and Tammy Beal and Lead Counsel for the
 Class*

1 Dated: October 6, 2025

FENWICK & WEST LLP

2
3 By: /s/ Catherine D. Kevane
4 Catherine D. Kevane (CSB No. 215501)
5 Marie C. Bafus (CSB No. 258417)
6 555 California Street, 12th Floor
7 San Francisco, CA 94104
8 Telephone: (415) 875-2392
9 ckevane@fenwick.com
10 mbalus@fenwick.com

11 Y. Monica Chan (*pro hac vice*)
12 401 Union Street, 5th Floor
13 Seattle, WA 98101
14 Telephone: (206) 389-4510
15 mchan@fenwick.com

16 *Counsel for Defendant Andrew R. Allen*

17 FENWICK & WEST LLP
18 ATTORNEYS AT LAW

ATTESTATION OF CONCURRENCE IN FILING

I hereby attest that concurrence in the filing of this document has been obtained from counsel for Lead Plaintiff Richard Rodriguez and Additional Plaintiff Tammy Beal.

By: /s/ Catherine D. Kevane
Catherine D. Kevane

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED:

HONORABLE CHARLES R. BREYER
UNITED STATES DISTRICT JUDGE